aggregate result can be compared to the flow through rates for flow-through eligible orders. SBC/Ameritech should disaggregate this data by product type so that the CLECs, SBC/Ameritech, and the Commission can more easily identify the areas where flow through improvement is necessary. SBC/Ameritech indicated that it has no objection to this performance measuring proposal.[103] AT&T has provided specific language to be inserted into SBC/Ameritech's POR consistent with these requirements.[104]

Disputed Issue 42: Unsolicited 865 Transactions

Unsolicited 865 transactions are 'provider initiated reply transactions' sent to CLECs from SBC/Ameritech to communicate a change of information on the original firm order confirmation (FOC) or to signal a change of status on the order.

The field level details related to the information contained in the 865 transactions are in dispute by the parties.

SBC/Ameritech Commitment

In its POR, SBC/Ameritech committed that within an 865 Transaction it will give the CLECs the "appropriate data" that "will allow the CLEC to associate the response to the appropriate request."[105] Specifically, SBC/Ameritech will provide in each 865 Transaction the Purchase Order Number ("PON") and the last version number related to that PON for which SBC/Ameritech sent a FOC.

AT&T Requested Relief

AT&T requests that the Commission order SBC/Ameritech to provide the following information on each 865 transaction: (1) the PON of the order it relates to, and (2) the version number which to which the transaction relates.

Discussion

Unique to the Ameritech region, SBC/Ameritech's systems and processes generate electronic notices referred to as " Unsolicited 865 Transactions." These notices

[102] Staff Exhibit 2 (Staff Initial Comments), p. 34.
[103] Tr. 517-518 (Mr. Gillis).

are sent after SBC/Ameritech has already provided the CLEC a Firm Order Confirmation "FOC" with a scheduled provisioning due date. The 865 Transaction alters a previously confirmed CLEC order for resale and unbundled elements. Ameritech uses these update notices to correct or change confirmed due dates, order numbers, telephone numbers, or other miscellaneous information. They are "unsolicited" because they are not sent as a result of a CLEC initiated activity, but rather are used to notify the CLEC of a change Ameritech is making to an already confirmed order.

The unsolicited 865 transactions are costly for CLECs to process because of flaws in the design of SBC/Ameritech's systems that create the transactions. For the most part, the notices advise CLECs of changes that may be customer impacting (e.g., a changed due date). As noted at the hearing, SBC/Ameritech only provides a limited amount of information regarding the order or supplement to which the 865 notice relates. The limited amount of information included the 865 transaction is the cause of the confusion on the CLEC side. The example used at the hearing was quite simple[106]:

(1) **Version A:** A CLEC sends an order to SBC/Ameritech for Customer John Doe for one telephone number. The order sent to SBC/Ameritech must include the CLEC PON (e.g., PON 123) and a Version number (e.g., Version A). In this case, the version would be designated as "Version A" since it was the first version of the order sent to SBC/Ameritech. Ameritech then sends the CLEC a FOC for this order. The FOC must include the PON number (123) and the version (Version A).

(2) **Version B:** A CLEC sends a supplement to the original order for Customer John Doe requesting a second telephone number. The supplemental order sent by the CLEC in this case must include a reference to PON 123. In addition, this particular supplement will reference itself as Version B, since it was the second version of that order sent to SBC/Ameritech. Ameritech would then send the CLEC a FOC for this order. That FOC would include a reference to PON 123 and Version B.

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[104] See AT&T Revised POR, Attachment A hereto, pp. 50-51. AT&T notes that it believes Staff's suggestions regarding flow-through are also a good starting point. See Staff Exhibit 2 (Staff Comments), pp. 34-36.
[105] Ameritech POR.
[106] Tr. 965-977.

(3) **Version C:** A CLEC sends a second supplement to the original order for Customer John Doe requesting a third telephone number. This second supplemental order sent by the CLEC in this case will include a reference to PON 123 and this particular supplement will reference itself as Version C, since it was the third version of that order sent to SBC/Ameritech. Ameritech would then send the CLEC a FOC for this order. That FOC would include a reference to PON 123 and Version C.

(4) **865 Notice:** SBC/Ameritech then sends an 865 notice to the CLEC indicating that the "telephone number is not available" or perhaps that the order is cancelled. This notice will include a reference to PON 123. However, even though this notice might relate to the very first telephone number the CLEC orders for John Doe (Version A above), the notice will only include a reference to Version C, the last order for which that SBC/Ameritech sent a FOC.

The example makes one thing clear, the 865 notice as proposed by SBC/Ameritech will *not* provide information that would allow the CLEC to electronically track the notice to the version number to which it relates. Thus, while SBC/Ameritech's POR claims that it will provide CLECs sufficient information to "associate the response [the 865 notice] to the appropriate request [the version of the order it relates to]," this is simply not the case. Even Mr. Gillis admitted that the version number that SBC/Ameritech has committed to place on the 865 notice was *not* intended to help CLECs track the 865 notice to the version to which it might relate. As Mr. Gillis stated, "We have agreed to now insert onto the 865 transaction a version number equivalent to the last supplement we had processed at the time this 865 has generated. **Not as a means to pointing to any particular version**, but it's a means of indicating what state of the order we are operating on at the moment when the 865 is generated."[107]

As explained at the hearing, the 865 notices cannot be processed by CLEC electronic systems, but must be processed manually. This is because CLEC systems are

[107] Tr. 974.

set up differently than SBC/Ameritech's.[108] Because of these differences, the Key data elements for correlating the CLEC order and the 865 transaction are not usable. The CLECs systems, for example, continue to keep each version of an order (in the example above A-C) as a separate discrete order. Thus, when the 865 notice is sent with an ambiguous or contrived version number, the CLECs cannot find the order to which it relates. Instead, the CLEC must manually search its entire order inventory.[109]

Unless the CLEC representative can match the 865 to the proper order precision of an order, the advice to the CLEC's end user may be mistaken or misleading. And the information communicated in the 865 is critical customer affecting information, such as a changed due date, or a cancellation. This information needs to be communicated to the CLEC customer as soon as possible. Quite obviously, this problem requires CLECs to expend valuable resources and employee time.

The CLEC request here is simple: the 865 transaction should provide the version number of the order to which it relates. The Commission should order SBC/Ameritech to provide this critical information.

Disputed Issue 46: Hot Cuts Coordinated Issues and Procedures

The process to be followed when an existing Ameritech customer is switching service to a CLEC involves two separate changes that must be made almost at the same time by the CLEC and SBC/Ameritech to ensure that the customer does not lose service. Coordinated cuts are scheduled the day of the cut over via a phone call between the two parties involved.

As an outgrowth of the WI OSS collaborative CLECs and SBC/Ameritech have been working on the processes and procedures for Hot Cuts since early June. Some IL CLECs interested in providing input to the Hot process have participated in these WI sub-team meetings. There is still process and procedure disputes between the parties despite the work of the sub-team.

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[108] Tr. 1010-1015.
[109] *Id.*

SBC/Ameritech

SBC/Ameritech has committed to implement a hot cuts process that allows for ANI/dial tone testing either two days or one day prior to the due date of the loop cutover.

AT&T Requested Relief

SBC/Ameritech has not agreed to three portions of that language. First, AT&T believes that the ANI/DT test should take place in the normal course of SBC/Ameritech's processes, not just when a CLEC requests it. Second, if a problem is found in the ANI/dial tone test on the CLEC end, SBC/Ameritech does not give the CLEC prompt notice of this problem. The Commission should order SBC/Ameritech to give CLECs notice of a problem within one hour of completion of the ANI/DT test to allow the CLEC time to cure the defect prior to the due date.

Discussion

In its initial comments, AT&T commented at length regarding the problems it has encountered with conducting hot cuts with SBC/Ameritech.[110] AT&T also identified the commercial importance of a failsafe hot cut process to its marketing plans. For the sake of brevity, AT&T will not rehash that discussion here.

At this point, three issues remain concerning hot cuts process and procedures: (1) whether SBC/Ameritech will conduct pre-cut over testing 48 hours in advance of the due date as a matter of normal course; (2) whether SBC/Ameritech will give CLECs sufficient notice of a problem on a cut to allow the CLEC time to fix a problem on their end if discovered prior to the cut; and (3) what will AT&T pay for a ANI/DT test. AT&T only seeks resolution of the first two issues in this case.[111] It is not seeking resolution of pricing issues in this docket.

For the most part the parties have come to agreement on a hot cut process and procedure. Importantly, SBC/Ameritech has agreed to conduct an Automatic Number

[110] AT&T Exhibit 4.0 (AT&T Initial Comments), pp. 32-42.

Identification and Dial tone test ("ANI/DT test") 48 hours prior to the cut taking place. This test is important, because as SBC/Ameritech witness Ms. Naviskas noted, the hot cut process entails coordination between the CLECs and SBC/Ameritech.[112] SBC/Ameritech must physically lift the wiring for a loop off of its facilities and connect them to the CLEC facilities housed in collocation space located in SBC/Ameritech's central offices. The CLECs, on the other hand, must complete switch translations prior the cut taking place. As Ms. Naviskas explained, that ANI/DTtest assures that there is dial tone over a loop and that the switch translations have been conducted properly. [113]

Although SBC/Ameritech has agreed to conduct the ANI/DT test 48 hours prior to the cut, it will only due so when requested by the CLEC. This entails extra work by the CLEC in filling out a form and faxing it to SBC/Ameritech for each and every loop order. Because of the importance of ANI/DT testing prior to the due date, AT&T requests that the Commission order SBC/Ameritech to make ANI/DT testing part of SBC/Ameritech's normal course of business. In fact, Ameritech's sister company SWBT does just that. Attached as Attachment B to these comments is a hot cut process agreed to between SWBT and AT&T. Pursuant to that process, SWBT specifically agreed to conduct ANI/DT testing prior to the cut-over date as a matter of course.[114] Ameritech should import this "best practice" to Illinois. As AT&T witness Mr. Finney stated, "every Illinois CLEC" is of the opinion that they can support pre-cutover testing

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[111] In fact, AT&T believes that the price for this testing should be free since the TELRIC price for the loop it has purchased includes Ameritech's cost for testing that loop. In other words, it is AT&T's position that it is purchasing a fully-tested loops.
[112] Tr. 626.
[113] Tr. 627.
[114] Attachment B hereto, p. 5, Section 1.6 ("SB LOC [Southwestern Bell] will check the ALS Dial Tone (DT) and Automatic Number Identification (ANI) . . . on DD-1 [due date minus 1].")

48 hours prior to a cut.[115] No Illinois CLEC to AT&T's knowledge has taken issue with this proposed process.

Once the test is complete, SBC/Ameritech has agreed to correct any deficiencies found in their equipment and facilities. In addition, SBC/Ameritech has agreed to notify the CLEC of any CFA, dial tone, or switch translation problems identified in the CLEC's network. If a problem is discovered on SBC/Ameritech's end, SBC/Ameritech has committed to attempt to fix that problem before the due date. However, SBC/Ameritech has refused to allow CLECs the same opportunity -- to attempt to rectify those problems as soon as they are discovered.[116] Instead, if a problem is discovered on the CLEC end, SBC/Ameritech only give the CLEC notice of the problem (at best)[117] before the close of business the next day – the day before the cut. Obviously, this leaves the CLEC little time to attempt to fix the problem before the due date. If the cut is scheduled for early in the day, the CLEC may have mere hours to alleviate the problem. If the cut is scheduled at the end of the next day, the CLEC will have at best one full business day to alleviate the problem. If the problem is not fixed before the due date, the cut-over is stopped and the CLEC must either cancel the order entirely, or supplement it with a new due date, thereby beginning the process anew.

This process undercuts the entire basis for pre-cut-over testing. Indeed, the entire point of conducting a test two days prior to the due date is to allow the CLEC ample time to fix a problem before the due date, thereby keeping the customer's original due date in tact. SBC/Ameritech's proposal would generally give CLECs less than one

[115] Tr. 656.
[116] Tr. 648-49.
[117] This assumes the cut takes place before noon. If not, then CLECs receive notice of a problem on the actual due date giving them even less time to respond to a problem.

business day to fix a problem. Aside from giving itself an advantage in the market, there is absolutely no reason why SBC/Ameritech should not give CLECs prompt notice once a test uncovers a problem on a loop.

In fact, its sister company SWBT does just that. Attached as Attachment B to this brief is a hot cut process agreed to between SWBT and AT&T. Pursuant to that process, SWBT specifically agreed to give AT&T notice of a problem on a cut **within one hour** of the completion of the ANI/DT test. This prompt notice allows the CLEC the time needed to resolve the problem before the due date and proceed with the cut as originally scheduled. This is a best practice that Ameritech should bring to Illinois.

AT&T therefore urges the Commission to accept AT&T's proposed additions to the POR in regard to hot cuts and order SBC/Ameritech to (1) provide pre-cutover ANI/DT testing 48 hours in advance of a cut as a matter of course, and (2) give CLECs notice or a problem with a cut within one hour of completion of that ANI/DT test.

Disputed Issue 62: Directory Listing Retrieval

a) SBC Ameritech has committed to support the inquiry of directory listing orders over a single interface for all orders, except partial migrations, in September 2001. CLECs would like directory listing orders to be supported over a single interface prior to September 2001.

b) The functionality and or process by which SBC/Ameritech will provide CLECs with directory listing information published for UNE loop end users after those listings have been published is in dispute.

c) Ameritech has stated the yellow page headings will only be available via their affiliate, Ameritech Advertising, Inc. regardless of how the order is originally placed.

SBC/Ameritech Commitment

In regard to directory listing orders sent along with a CLEC local service order, SBC/Ameritech has indicated that it will provide a single interface for CLECs to place such orders across a single interface to SBC/Ameritech in September 2001. Until that time, CLEC orders for resale or UNE-P orders containing directory information can be sent through Ameritech, while orders for all other service, including UNE-loops, must be

sent through a separate interface that connects to SBC/Ameritech's advertising affiliate Ameritech Advertising, Inc. ("AAS")

In regard to directory listing retrieval, SBC/Ameritech will only make available those listings that relate to resale and UNE-P customers available through the Ameritech interface. CLECs that need access to other listings would be required to separately process their inquiries as they do now, through SBC/Ameritech's affiliate AAS.

AT&T Requested Relief

The Commission should direct SBC/Ameritech to design its directory listing inquiry systems and ordering systems to function over the SBC/Ameritech provided interface. In addition, the Commission should order SBC/Ameritech to move up its delivery date of the integration of the loop and directory listing order by six months, to March 2001. Finally, the Commission should order SBC/Ameritech to modify its customer service record design so that CLECs and Ameritech have equivalent information about business end user listings. Ameritech's design for the separate directory listing query (due in March 2001) should also be modified to provide the same information on business end user listings. AT&T has proposed additions to the revised POR to effectuate these proposals. See AT&T Revised POR, Attachment A hereto, pp. 46-47 and 52.

Discussion

Based on the comments filed thus far, and the hearing, there is little more to add in regard to the directory listing debate.[118] At heart, the problem CLECs have identified relates to the fact that for both ordering and retrieving directory listings, even after the March 2001 release, CLECs will have to utilize two separate interfaces to access these listings. For certain order types (resale, UNE-P), the CLECs will order and access listings through Ameritech's interface. While for other order types (e.g., loops) CLECs must access directory listings information through AAS' interface.

This dual interface problem is unduly and unnecessarily burdensome to the CLEC. For example, the CLECs must maintain two separate interfaces and train their employees on two separate sets of business rules for these interfaces. It is important to note the SBC/Ameritech has a legal obligation under the 1996 to provide CLECs

"nondiscriminatory" access to directory listings. But SBC/Ameritech's proposal would provide certain carriers less desirable access to directory listing ordering and information based solely on the manner in which that carrier chooses to provide service. A carrier providing service through resale would have a competitive advantage over a carrier providing service through UNE-loops, for example. This result is discriminatory.

SBC/Ameritech has provided no good reason why directory listing ordering and inquiries could not be provided over one interface for all CLEC requests. Indeed, the record is clear that both Pacific Bell and SWBT provide directory listing ordering through a single SWBT interface.[119] SBC/Ameritech has committed to providing one interface for ordering in September 2001. But it has provided no good reason why this date could not take place sooner. Thus, CLECs request that this date be moved up to March 2001.

In addition, SBC/Ameritech has made no commitment to similarly integrate their directory listing retrieval interfaces. Instead, they have only committed to providing listing information that relates to resale and UNE-P customers available through Ameritech. CLECs that need access to other listings would be required to separately process their inquiries as they do now, through SBC/Ameritech's affiliate AAS. There is no reason why this discriminatory practice should continue. Thus, the Commission should order SBC/Ameritech to make directory listings retrieval available over a single interface.

The final issue in regard directory listings relates to the fact that Ameritech's customer service record provided to CLECs does not contain the yellow page heading

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[118] AT&T Exhibit 4.0 (AT&T Initial Comments, pp. 49-52.
[119] Tr. 1056-57.

and section information. If an end user requests confirmation of the heading and section order entries once the order is completed by Ameritech, the CLEC must send a separate query to the Ameritech directory subsidiary to resolve the end user's questions or to add or change the sections and headings. As noted, this separate inquiry adds time and costs to CLEC operations and is unique to CLEC inquiry requirements. Ameritech representatives have access to all directory listing information, incorporated within the Ameritech customer service record, and need not separately query the Ameritech advertising system to determine the section and heading entries. Ameritech should modify its customer service record design so that CLECs and Ameritech have equivalent information about business end user listings. AT&T has proposed additions to the revised POR to effectuate these proposals.[120]

Disputed Issue 74: Line Splitting

Line Splitting is the physical division/split of the high frequency portion of the loop (used for data services) from the low frequency portion of the loop (used for voice services). One provider supplies a customer data service while a separate provider, not Ameritech, offers the same customer their voice service.

CLECs have requested that SBC/Ameritech support ordering that will allow a CLEC to provide voice services over a loop and the same CLEC, or a different CLEC, to provide data services over the high frequency portion of the loop. Ameritech in this scenario would not provide either the voice or the data on the loop in question. Today, SBC/Ameritech cannot support this functionality being requested by the CLECs.

SBC/Ameritech Commitment

SBC/Ameritech have made no commitment in regard to providing line splitting.

AT&T Requested Relief

AT&T requests that the Commission order SBC/Ameritech to provide OSS to support the ordering of line-sharing as described by AT&T. AT&T has proposed specific POR language to capture this request. See AT&T Revised POR, Attachment A hereto, pp. 40-42. At this stage the language is primarily a framework that establishes the right

[120] See AT&T Revised POR, Attachment A hereto, pp. 46-47.

of CLECs to request line splitting, including the "line at a time" option for provision of splitters, and associated OSS; it leaves for further collaboration the detailed requirements needed to implement this requirement.

Discussion

SBC/Ameritech's defense on the issue of line splitting is three-fold. First, it claims that the issue does not belong in this OSS proceeding. Second, it claims that this issue is before the FCC and should be decided there. Third, it claims it is not required to provide line-splitting. All of these arguments should be rejected.

As a preliminary matter, the issue of whether or not SBC/Ameritech should allow CLECs to order line splitting is clearly at issue here. CLECs are seeking the provision of OSS to allow mechanized provisioning of line splitting. It is SBC/Ameritech's refusal to make available the "product" that has precluded discussion of the OSS issues. In substance, the CLECs are requesting the Commission in this arbitration to require Ameritech to specify OSS for line-splitting as requested, and that Phase II remain open for that purpose and to that extent. But before we can engage SBC/Ameritech on the OSS issues, the Commission must order that line splitting be made available.

Second, SBC/Ameritech claim that the line-splitting issue is being decided at the FCC and should remain there. But in the very process of declining to reject SWBT's 271 application in Texas on this ground, the FCC stated that line splitting was, in its words, a "recent development" appropriate for further negotiation and, if necessary, arbitration before the state (Texas) commission.[121] Thus, the FCC clearly contemplated that state commissions could and would decide issues surrounding line splitting in state-specific arbitration proceedings such as this one.

[121] Memorandum Opinion and Order in CC Docket No. 00-65, Application by SBC Communications Inc., etc. (June 30, 2000)("Texas 271 Order"), ¶ 324.

Finally, all of the issues turn upon the core question of whether Ameritech should be required to provide AT&T with "line splitting," or access to the high frequency portion of the loop by a UNE-based voice CLEC, as discussed in AT&T's Initial Comments, pp. 52-29. The line splitting OSS ordering option requested by AT&T includes Ameritech provision of a splitter as part of the UNE loop functionality, but without the collocation requirement that Ameritech seeks to impose. AT&T simply seeks the provision of the necessary Operational Support Systems (OSS) to support this type of line splitting.

Ameritech's response to these issues rests on the legal argument that it is not required under existing FCC orders to provide line splitting. The flippant response to this argument would be "so what?" The savings provisions of TA 96, Section 261(c), would in all events leave open to the states the option to require line splitting to support local exchange competition, and the argument might well be rested at that. Because Ameritech the very "authorities" that it cites so plainly undermine its own argument, AT&T will respond briefly.

Ameritech relies on the FCC's Line Sharing Order and it Texas 271 Order[122] as the basis for its claim that line splitting is not a legal requirement. In the Line Sharing Order, the FCC *defined* line sharing as the provision of an xDSL-based service by a competitive LEC and voiceband service *by an incumbent LEC* on the same loop.[123] Subsequently, in its Texas 271 Order, the FCC explicitly recognized the distinction between line sharing and line splitting. Referring to the submissions of AT&T and others in that docket, the FCC observed: [T]he situation that these commenters describe is not

[122] *Id.*
[123] E.g., Third Report and Order, CC Docket Nos. 98-147/96-98, (rel. December 9, 1999) para. 70.

technically line sharing, because both the voice and data service will be provided by competing carriers over a single loop. . . .To avoid confusion, we characterize this type of request as 'line splitting' rather than line sharing."[124] The Commission acknowledged expressly that "[l]ine sharing and line splitting present two different scenarios under our rules." Id. at par. 329.[125] In the context of the Texas 271 Order, the FCC observed that it had not to that point exercised its "legislative rulemaking authority" under section 251(d)(2) to require access to the splitter and applied its decisional rule in the 271 context that an RBOC is held to the legal obligations extant at the time of the application; consequently, it declined to disapprove SWBT's application on the grounds that the company refused to offer line splitting.

As noted, in the very process of declining to reject SWBT's 271 application in Texas on this ground, however, the FCC stated that line splitting was, in its words, a "recent development" appropriate for further negotiation and, if necessary, arbitration before the state (Texas) commission. Id. In other words, the very decision to which Ameritech cites leaves open to a state commission authority to impose line splitting.

In fact, the arbitrators in Texas have done just that. In a recent arbitration decision, the Texas Commission ordered SWBT to provide CLECs access to the HFPL (High Frequency Portion of the Loop). The recent decision by the Texas arbitration panel – addressing among other things AT&T's petition for line splitting – illustrates that state action need not await action on the part of the FCC. Finding that the Texas PUC has the authority to order nondiscriminatory access to the high frequency spectrum portion of the loop, the Texas Arbitrators stated:

[124] Texas 271 Order, at para. 324.

> The FCC has clearly stated that its requirements are the minimum necessary, and that state commissions are free to establish additional requirements, beyond those established by the FCC, where consistent.[126] Indeed, in the *SWBT Texas 271 Order*, the FCC acknowledged that line splitting, a recent development, would be subject to potential arbitration before the Texas Commission.[127]

The Texas Arbitrators concluded that it is "sound public policy" to require SWBT to provide AT&T with a UNE loop that is fully capable of supporting xDSL service, as AT&T had requested.[128] As they recognized, line splitting and line sharing are virtually the same from a technical standpoint and, if consumers are to benefit from competition, then ILECs must support line splitting as well as line sharing. The Illinois Commission should reach the same conclusion.

Again, this issue boils down to the question whether Ameritech should be *required* to provide Ameritech-owned splitters to UNE-based CLECs, along with the necessary supporting OSS, free of a collocation requirement and provisioned efficiently. As the FCC observed in the Texas 271 Order, incumbents LECs are required to permit CLECs to engage in line splitting where they purchase the entire loop and provide their own splitter. AT&T is seeking confirmation of the right to the line splitting capability over the UNE-P with Ameritech furnishing the line splitter. This is the only way to allow the addition of xDSL service onto UNE-P loops in a manner that is efficient, timely, and minimally disruptive. It is the only way the incumbent carrier can satisfy its obligation to provide access to all the functionalities and capabilities of the loop, including electronics attached to the loop.

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[126] *Citing* UNE Remand Order at ¶¶ 154-60; Line Sharing Order at ¶¶ 223-25.

[127] Texas Public Utility Commission Docket No. 22315, Arbitration Award, p. 16 ("Texas Arbitrators' Report").

[128] Texas Arbitrators' Report, at 16.

The authorities Ameritech invokes in support of its argument that it need not provide splitters in this fashion are the same provisions of the Line Sharing and Texas 271 orders, and they are inapt for the same reasons. The splitter function is encompassed within the features, functions and capabilities of the (UNE) loop that it acquires when it purchases the UNE-P, and it therefore required to be made available in order that AT&T, the requesting carrier, can provide a telecommunications service.[129] Ameritech in its brief concedes that it has agreed to voluntarily provide splitters (and on a "line at a time" basis, as requested by AT&T) when it engages in line sharing (and therefore continues to provide the voice service) with a data CLEC. As the Texas Arbitrators have recently found, its refusal to do so in the context of line splitting with a UNE-based carrier is discriminatory. This Commission should reach the same finding.

Included in AT&T Revised POR is proposed POR language addressing the CLECs position on this issue. At this stage the language is primarily a framework that establishes the right of CLECs to request line splitting, including the "line at a time" option for provision of splitters, and associated OSS; it leaves for further collaboration the detailed requirements needed to implement this requirement.[130]

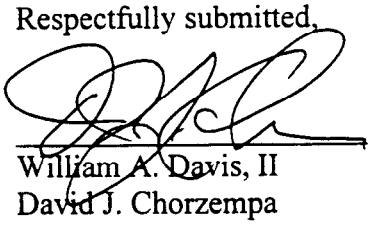
[129] Splitter provisioning is also analogous to line conditioning activities which the ILECs are required to perform.
[130] See AT&T's Revised POR, Attachment A hereto, pp. 40-41.

CONCLUSION

For the foregoing reasons, the Commission should adopt AT&T's proposals made in this proceeding.

Dated: October 13, 2000

Respectfully submitted,



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Attachment A

AT&T REVISED LANGUAGE
AMERITECH ILLINOIS PLAN OF RECORD

Illinois OSS Plan of Record

I. OVERVIEW

A. Introduction

SBC/Ameritech currently makes a wide variety of Operational Support System (OSS) interfaces available to CLECs in its four service areas: Ameritech, Pacific Bell/Nevada Bell (PB/NB), Southwestern Bell Telephone (SWBT) and Southern New England Telephone (SNET). Although these interfaces all provide access to OSS functionality for pre-ordering, ordering, provisioning, maintenance and repair and billing services, there are regional differences in the interfaces and how they operate. Accordingly, as part of the October 8, 1999 SBC/Ameritech Merger Conditions, SBC/Ameritech agreed to develop and deploy commercially ready, uniform application-to-application and graphical user (GUI) interfaces for the support of these functions.

This Uniform and Enhanced OSS Plan of Record (POR) is the initial milestone of the three-phase process set out in the Merger Conditions for the development and deployment of uniform application-to-application and GUI interfaces that present telecommunications carriers that are users of the interfaces with the same version(s) of industry standards, data formatting specifications and transport and security specifications across the 13-State SBC/Ameritech Service Area.

B. Scope

The focus of this POR defines a plan for SBC/Ameritech to make available modified OSS, in accordance with the schedule and commitments outlined in the SBC/Ameritech Merger Conditions. These OSS include application to application interfaces and graphical user interfaces (GUIs) which support pre-ordering, ordering, provisioning, maintenance and repair and billing for resold services, individual Unbundled Network Elements (UNEs), combinations of UNEs, and standalone Local Number Portability[1]. While most of these interfaces are existing and currently in use, additional access to these OSS functions will be provided as a result as this plan.

Section II of this POR details the Present Method of Operation (PMO) for all existing OSS interfaces in the four SBC/Ameritech Service Areas. In Section III, the Future Method of Operation (FMO) of these interfaces, including plans for the development and deployment of modifications designed to ensure the availability of uniform, electronic OSS interfaces throughout the 13-State SBC/Ameritech Service Area, is specified.

Finally, there are a number of proprietary and/or retail interfaces that SBC/Ameritech makes available in its four service areas that are not addressed in the POR. All interfaces that are currently available to CLECs PMO in the 13 state region are listed in table 8. Changes to these interfaces, including full retirement of the

[1] ~~FCC Uniform and Enhanced AT&T Language (CLOSED). Footnote references to "FCC Uniform and Enhanced" refer to plan language derived from the SBC/Ameritech Plan of Record developed in response to the FCC SBC/Ameritech Uniform and Enhanced OSS Merger Condition, or to activities which are part of that FCC plan referenced in this plan.~~

interface will be conducted according to the terms of the Change Management Process (CMP) as described later in this document[2].

C. Process Methodology

This POR follows the framework established by the SBC/Ameritech Pre-Merger "OSS Process Improvement Plan".

SBC states[3] the following steps were taken to create this plan:

- Subject matter experts representing all of the SBC/Ameritech service areas were assembled from various OSS business requirement areas and from Information Technology system and architecture areas.
- The PMO was documented for pre-ordering, ordering, provisioning, maintenance and repair and billing interfaces.
- The FMO interfaces and processes for pre-ordering, ordering, provisioning, maintenance and repair, and billing were identified and documented.
- An FMO implementation plan documenting the appropriate interface changes and associated timelines was documented.

SBC states the criteria for determining the future method of operation included, but was not limited to:

- Business requirements, including the number of actual current users, the volumes currently processed, the flow-through capability that already exists as well as the expected number of users and requests (i.e., future capacity requirements).

- Industry standards or guidelines, such as those published by T1, the Ordering and Billing Forum (OBF) and Telecommunications Industry Forum (TCIF).

- Downstream impacts of any changes, such as the effect that changes in the applications would have on methods and procedures.

- CLEC input, including the types of change requests CLECs are initiating, the discussions in change management meetings regarding developmental plans, CLEC specific feedback from the account teams, other OSS support personnel, training classes and CLEC forums.

- The architecture of SBC/Ameritech's current OSS, including available data and functionality.

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[2] ~~FCC Uniform and Enhanced AT&T Language (CLOSED)~~

[3] ~~FCC Uniform and Enhanced AT&T Language (CLOSED)~~

- The current security methods including firewalls, addresses, passwords, and current CLEC access methods.

SBC/Ameritech will follow the three-phases identified in the SBC/Ameritech Merger Conditions. SBC/Ameritech will work collaboratively with CLECs and the FCC Staff to obtain written agreement on OSS interfaces, enhancements and business requirements identified in this POR and ultimately develop and deploy those agreed upon changes in accordance with the schedules contained within the Merger Conditions.

Standards

Multiple bodies are involved in the setting of standards and guidelines for the OSS interfaces used for communication between ILECs and CLECs. SBC/Ameritech actively participates in these organizations, and is supportive of the timely implementation of the standards and guidelines issued by them.

Forums and Committees of the Alliance for Telecommunications Industry Solutions (ATIS), the Ordering and Billing Forum (OBF), the Telecommunications Industry Forum EDI Service Order Subcommittee (SOSC), the Telecommunications Industry Forum Electronic Communications Implementation Committee (ECIC), and the T1M1 Committee are the industry-recognized bodies that issue standards and guidelines applicable to the interfaces used in the pre-ordering and ordering of resold local service and unbundled network elements. The OBF issues guidelines covering the pre-ordering and ordering transaction flows and associated data elements, the SOSC provides the guidelines for the implementation of those transactions in EDI, and T1M1 the implementation of pre-ordering transactions in CORBA.

Currently, the OBF is developing version 5 of its Local Services Ordering Guide (LSOG 5), which is targeted for release in final form on July 26, 2000. The SOSC is expected to release version 5 of the EDI Electronic Local Mechanization Specifications (ELMS 5) on October 30, 2000 dependent on the release by the OBF of LSOG 5. Version 4 (LSOG 4) was released April 9, 1999. ECIC has issued two standards applicable to pre-ordering via CORBA: T1.265-1999 approved April 1999, and T1.267-1999 approved August 1999.

ATIS committees also provide standards and guidelines applicable to the repair and maintenance, and billing functional areas. The T1M1 committee has issued two standards governing the data elements and operation of the repair and maintenance interface: T1.227a-1999 and T1.228-1995. The OBF Message Processing Committee maintains the Exchange Message Interface guideline. Version 17 of this guideline was issued in January 2000. Issue 9 of the EDI billing guideline, maintained by the TCIF EDI committee and built upon the ANSI X.12, version 4010 EDI standard was published in December 1998. Telcordia's Carrier Access Billing System (CABS) Billing Output Specifications (BOS) for Bill Data Tape (BDT), version 32, were published in April 1999.

In this plan, SBC/Ameritech is committing to implementing the most current versions of standards available in the industry today. Because of the evolving nature of industry standards, SBC/Ameritech will work with the CLECs through the Change Management Process (CMP) to determine whether more advanced versions of the industry standards should be implemented in the uniform interfaces instead of those proposed in this document. The CMP will also be used to determine the appropriate implementation

of the selected standards versions, because a strict adherence to the standard might result in loss of existing functionality and because of the flexibility of implementation allowed within the standards and guidelines. These agreed-upon changes would be adopted for SBC/Ameritech's entire thirteen state serving area and would require region-specific transition plans[4].

Change Management

Each SBC/Ameritech service area has its own Change Management Process (CMP). These were developed collaboratively with the CLECs well before the SBC/Ameritech merger, and have each been in place since at least June 1999. These processes provide a means by which each regional company and the CLECs can work cooperatively to introduce changes to the OSS interfaces. These processes include specific intervals, such as when release specifications will be delivered to the CLECs for review and input.

A 13-state CMP is currently being addressed in a separate CLEC collaborative effort that began in November 1999 following the SBC/Ameritech merger close. The 13-state CMP has not yet been adopted. Implementation of this POR shall be governed by the provisions of the current draft of the 13-state CMP and associated transition plan specifically referenced within this document (Attachment A). SBC/Ameritech will implement all changes to the interfaces within the CMP and will use the exception process only on a limited basis.[5] All references to the Change Management Process or CMP within the Future Method of Operation section of the POR refer to the CMP adopted per this paragraph, unless specifically noted otherwise.

Telis/Exact will continue to be used for ordering Local Interconnect Facilities, Operator Assistance, Directory Assistance Trunks, Access Services, Unbundled Dedicated Transport, and Interconnection trunks, but its ability to order local loops will be sunset. When SBC/Ameritech sunsets this function of Telis/Exact for the ordering of local loops, SBC/Ameritech will notify the CLECs using the Group B Category 1 retirement process outlined in section 4 of the CMP.[6]

SBC/Ameritech agrees that there needs to be a process that addresses business process changes, such as manual processes and forms, that fall outside the scope of the OSS 13 state CMP, since the OSS CMP is limited to changes to the OSS interfaces, changes to OSS flow-through and the posting of changes to legacy systems as specified in the CMP document. To meet the need for a non-OSS change process, SBC/Ameritech and the CLEC community agreed to form a CLEC User Forum (CUF). This CUF was formed to provide a forum and resources to discuss and resolve non-OSS issues dealing with business processes, operations processes, service center processes, and changes to manual forms. Meetings are held monthly in each region. A document has been prepared specifying how SBC/Ameritech will introduce non-OSS changes to the CLECs. The CUF Guidelines includes a section titled "Non-OSS Change Management Process" used in all 13 states. The CUF Guidelines are attached to this POR as Attachment K.

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[4] ~~FCC Uniform and Enhanced AT&T Language (CLOSED)~~

[5] ~~FCC Uniform and Enhanced Issues 4, 8 and 134a (CLOSED)~~

[6] ~~FCC Uniform and Enhanced Issue 31a & 91(CLOSED)~~

II. PRESENT METHODS OF OPERATION (PMO)

There are similarities between the pre-ordering, ordering, provisioning, maintenance and repair, and billing functions offered by each SBC region. The following analysis detail the functional business processes and interfaces, specifically comparing Ameritech Illinois with Pacific Bell/Nevada Bell (PB/NB), Southwestern Bell Telephone (SWBT) and Southern New England Telephone (SNET).

There are differences in central issues to each functional area, e.g. standard data elements for maintenance, and functional alignment to standards for pre-ordering. These differences will be described for each functional area.

The PMO section contains information that is reflective of the methods of operation as of February 2000, the initial filing of the plan. Several of the changes contemplated by this plan have been implemented since that time and those changes are reflected in the Future Methods of Operation section of this document.

A. Pre-ordering

Available Interfaces

The Southwestern Bell Telephone (SWBT), Pacific Bell/Nevada Bell (PB/NB), Ameritech and Southern New England Telephone (SNET) regions provide CLECs with application to application access to pre-ordering functions via Electronic Data Interchange (EDI), which has been selected by the Ordering and Billing Forum (OBF) as one of the methods for exchanging information between telecommunications companies regarding orders for local service. SWBT and PB/NB also provide application to application pre-ordering functions via Common Object Request Broker Architecture (CORBA).

CORBA became an ECIC approved Industry Guideline for local service pre-ordering in September 1997. This approval provided two industry acceptable transport protocols for local pre-ordering, CORBA and EDI. CORBA was accepted as an alternative due to its fundamental ability to support interactive data exchange. CORBA is defined by the Object Management Group (OMG) and uses Interface Definition Language (IDL) data models as defined by the T1M1 committee of the Alliance for Telecommunications Industry Solutions (ATIS). The CORBA interface employs request-response message flows to exchange data between a message requestor and provider.

SWBT and PB/NB have implemented EDI pre-ordering functions based on the Ordering and Billing Forum (OBF) Local Service Ordering Guidelines (LSOG) version 4, Telecommunications Industry Forum (TCIF) Electronic Data Interchange Local Mechanization Specification (ELMS) issue 4, and EDI ASC X12 version 4010. Ameritech and SNET EDI pre-ordering interfaces were implemented prior to acceptance of industry guidelines, and utilize ASC X12 version 3072.

SWBT and PB/NB have also implemented CORBA pre-ordering functions based on the OBF LSOG version 4, ANSI T1.265-1999. SNET has not made a CORBA-based pre-ordering interface available to CLECs.

Ameritech Illinois has made the EDI pre-ordering interface available for local service pre-ordering and does not currently support a CORBA-based pre-ordering interface.

In addition to the application to application interface using EDI/CORBA, the SWBT and PB/NB regions also provide pre-ordering functions via DataGate. DataGate is a proprietary application to application interface implemented prior to the acceptance of industry guidelines.

Graphical User Interface (GUI) access to pre-ordering functions is provided to CLECs in the SWBT and PB/NB regions via the Verigate interface . SNET provides GUI access to pre-ordering functions via W-CIWin.

Ameritech Illinois provides GUI access to pre-ordering functionality via TCNet.

The following table summarizes the pre-ordering interfaces available in the SBC operating regions as of February 2000.

Pre-Ordering	SWBT	PB/NB	SNET	Ameritech
Industry App to App Gateway				
Application Name	EDI/CORBA	EDI/CORBA	MSAP	EDI
LSOG Version	4	4	NA	NA
Protocol / Version	EDI 9 / 4010	EDI 9 / 4010	EDI / 3072	EDI / 3072
Protocol / Version	CORBA / T1.265-1999, T1.267-1999	CORBA /T1.265-1999, T1.267-1999		
Proprietary App to App Gateway				
Application Name	DataGate	DataGate		
Proprietary GUIs				
Application Name	Verigate	Verigate	W-CIWin	TCNet

The following table provides a summary of the EDI transaction usage on the pre-ordering application to application interfaces in the SBC/Ameritech operating regions:

RECORD TYPE	SWBT	PB/NB	SNET	Ameritech
997	Acknowledgment	Acknowledgment	Acknowledgment	N/A
850	Initial Request	Initial Request	Initial Request	Initial Request
855	Response	Response	Response	Response (except CSI)
864	N/A	N/A	N/A	CSI Response

EDI Message Flows